## REMARKS

Claims 1-8 are all the claims pending in the application. Claims 1-8 presently stand rejected.

Claims 1-8 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Masuda et al. (6,340,999).

## Analysis

Masuda is directed to improving the display quality of an LCD apparatus. Masuda notes that the prior art generally provided the polarizing section with the LCD device (see Figs. 3 and 16). However, various problems (e.g., brightness fringe) resulted from the distance between the polarizing member and the light guide (col. 3, lines 10-15 and lines 25-27). Masuda notes that another prior art device prevented the reflection at the interface between the light guide and the liquid crystal panel, by adhering the liquid crystal cell to the light guide (col. 3, line 64 to col. 4, line 4). However, Masuda recognizes that there is a problem with air bubbles between the liquid crystal cell 31 and the light guide 35 when they are closely attached together (col. 4, lines 5-10) due to their rigid characteristic, and moreover, this device does not include a polarizing member.

In view of the problems with these two types of prior art devices, Masuda provides a third type of construction wherein the polarizing member is attached to the light guide but not the LCD device. Thus, the three types of construction are generally shown below:

| 1 <sup>st</sup> Prior Art | 2 <sup>nd</sup> Prior Art | Masuda Device      |
|---------------------------|---------------------------|--------------------|
| light guide               | light guide               | light guide        |
| *air layer*               | LCD                       | polarizing section |
| polarizing section        |                           | *air layer*        |
| LCD                       |                           | LCD                |

With respect to the Masuda device discussed by the Examiner, while the polarizing member is indeed adhered to the light guide, it is not attached to the LCD device. Specifically (col. 9, lines 3-20):

"In the present invention, since it is undesirable that the reflective liquid crystal display device and the front light are in close contact with each other, the reflective liquid crystal display device is not attached to the front light. That is, when the reflective type liquid crystal display device (a liquid crystal cell) and the light guide are closely attached to each other as in the conventional display apparatus, since they are both rigid, bubbles may be introduced therebetween, an adhesive resin may not be sufficiently cured...On the other hand, in the present invention, an air layer is present between the reflective liquid crystal display device and the front light."

In the present invention, there is no air layer between the light guide and the LCD device. According to Figures 1 and 2 of the present invention, each of the light guide, polarizing section and LCD are directly attached to each other, respectively. According to claim 1, the plane light source (inclusive of the light pipe) is bonded to the liquid crystal display panel such that no air layer is interposed between the plane light source device and liquid crystal display panel. The liquid crystal display panel includes a polarizer on the visual recognition side of the liquid crystal display panel.

Masuda fails to teach or suggest such a structure, wherein the light guide and LCD device having a polarizer are bonded together with no air layer between them. In fact, Masuda teaches away from this structure, since Masuda teaches that there should be an air layer between the polarizer and the LCD. In other words, Masuda specifically teaches that the light guide and LCD should not be bonded together as discussed above. Thus, not only does Masuda fail to anticipate claim 1, one would not have been motivated to modify Masuda to arrive at claim 1. That is, one would not have been motivated to modify the second prior art to have the polarizer bonded to both the light guide and LCD, nor would one have been motivated to modify the Masuda invention to eliminate the air layer.

The remaining rejections are directed to the dependent claims. These claims should be patentable for at least the same reasons as claim 1, by virtue of their dependency therefrom.

## Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the

AMENDMENT UNDER 37 C.F.R. § 1.116 U.S. Appln. No. 09/898,060

Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

Registration No. 43,042

Ellen R. Smith

SUGHRUE MION, PLLC

Telephone: (202) 293-7060

Facsimile: (202) 293-7860

washington office 23373
customer number

Date: May 12, 2004